

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

|                                  |   |                               |
|----------------------------------|---|-------------------------------|
| PROTESTERS IN SUPPORT OF BLACK   | ) |                               |
| LIVES, <i>et al.</i> ,           | ) |                               |
|                                  | ) | No. 20–CV–06851               |
| Plaintiffs,                      | ) |                               |
|                                  | ) |                               |
|                                  | ) | Hon. Charles R. Norgle        |
| CITY OF CHICAGO, <i>et al.</i> , | ) | Magistrate Jeffrey T. Gilbert |
|                                  | ) |                               |
| Defendants.                      | ) |                               |

**JOINT STATUS REPORT**

Pursuant to this Court’s May 25, 2022 order (Dkt. No. 109), Plaintiffs, Defendant City of Chicago (“City”), Superintendent David Brown, and the Individual Defendant Officers jointly submit this Status Report regarding the Plaintiffs’ expedited discovery requests.

On May 27, 2022, Plaintiffs filed their Third Amended Complaint, where they substituted 17 named defendants for previously referenced John Doe Officers. On May 27, 2022, Plaintiffs notified the Court that they intend to file a Fourth Amended Complaint on or before July 15, 2022, should any John Doe Officers relating to the protests that occurred in July and August 2020 be identified through expedited discovery.

On June 7, 2022, pursuant to this Court’s order, the parties met and conferred to discuss certain additional preliminary discovery for statute of limitations purposes Plaintiffs still need to pursue. Specifically, Plaintiffs identified the following two items in a June 6 email to Defendants:

1. The identities of all Chicago Police officers who discharged pepper spray on August 15, 2020.
2. The identities of all Chicago Police officers who wore olive green Battle Dress Uniforms (whom Plaintiffs presume to be members of the SWAT team) on August 15, 2020, and which of those officers were equipped with pepper spray.

Plaintiffs agreed to make these requests in a formal Supplemental Interrogatory, which they will issue today. The City stated that it could not commit to being able to provide responsive

information in less than 30 days, but agreed to attempt to do so, if possible, and agreed to provide Plaintiffs with a time estimate next week after conferring with CPD.

Additionally, Plaintiffs advised that based on their ongoing review of BWC footage that has been produced thus far, they anticipate having screenshots of John Doe officers that they will request that the City attempt to identify, and they will also request that the City identify which officers were assigned and wearing particular BWCs. Plaintiffs will provide this information to the City as soon as possible.

Finally, the parties discussed Plaintiffs' previous request for the BWC footage referenced in the Tactical Response Report bates stamped CPD472. The City is continuing to search for this BWC footage and will provide Plaintiffs with an update next week.

Dated: June 7, 2022

Respectfully Submitted:

/s/ Ben H. Elson

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